

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MATTHEW STEIN and JEROME LHOTE,

Plaintiffs,

v.

SKATTEFORVALTNINGEN,

Defendant.

and

LUKE MCGEE,

Nominal Defendant.

23 Civ. 2508 (NRB)

SKATTEFORVALTNINGEN,

Counterclaim Plaintiff,

v.

MATTHEW STEIN, JEROME LHOTE, and  
LUKE MCGEE,

Counterclaim Defendants.

**EXHIBITS TO WITNESS STATEMENTS**

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Exhibit #	Summary	Date
1	E-mail from SOIK to M. Stein's U.S. counsel regarding charging	9/8/2020
2	Draft Settlement Agreement	12/14/2017
3	Records of payments of Initial Cash Payment	5/28/2019-9/1/2019
4	SKAT complaint filed against A. LaRosa	5/13/2018
5	Article identifying M. Stein and J. Lhote	9/27/2019
6	Records of payments of Subsequent Cash Payment	6/3/2020-4/19/2022
7	E-mail chain between M. Miller and SKAT's U.S. counsel regarding compliance with Section 8(f)	11/30/2020-2/6/2021
8	E-mail from M. Miller to SKAT's U.S. counsel regarding compliance with Section 8(f)	3/4/2021
9	Letter from SKAT's U.S. counsel regarding compliance with Section 8(f)	4/21/2023
10A	2019 Affidavit of Confession of Judgment	5/28/2019
11	E-mail from SKAT's U.S. counsel regarding compliance with Section 8(f)	4/26/2023
12	E-mails between SOIK and U.S. Dept. of Justice	1/19/2021
13	Letter from M. Miller to SOIK providing Settlement Agreement + Attachment	4/21/2021
14	Documents regarding seizure of M. Stein, J. Lhote, and L. McGee assets	3/16/2020-2/4/2021
15	E-mail from SOIK to SKAT dismissing 2.26.21 question	2/3/2022
16	SOIK e-mail relating to Danish criminal case schedule	4/8/2022
17	E-mail from SOIK to J. Stein's U.S. counsel regarding charging	9/8/2020
27	Letter from McGee's U.S. counsel to J. Schneider regarding payments under the Settlement Agreement	4/8/2021
101	E-mail chain between SKAT and SOIK regarding settlement negotiations	4/25/2020
103	E-mail chain regarding providing draft Section 8(f) to SOIK	5/15/2019
104	Executed Settlement Agreement	5/28/2019
105	E-mail from SKAT to SOIK providing draft Section 8(f)	5/15/2019
106	SKAT's press release announcing the Settlement Agreement	5/29/2019
107	E-mail chain between SKAT and SOIK regarding draft press release	5/20/2019
108	E-mail from SKAT to SOIK providing Settlement Agreement exhibits	5/21/2019
109	Executed Letter Agreement	5/28/2019
110	E-mail chain regarding SKAT providing principles for communications to SOIK	5/21/2019
113	E-mail from SKAT to SOIK re meeting to discuss Settlement Agreement	6/26/2019
114	Agenda for meeting to discuss dividend case	7/3/2020
115	SKAT e-mail chain regarding draft press release	9/25/2019
118	SOIK's 1/6/2021 inquiry to SKAT and e-mail chain	1/6/2021
120	SKAT e-mail chain regarding draft response to SOIK's 1/6/2021 inquiry	1/14/2021
121	SKAT e-mail chain regarding response to SOIK's 1/6/2021 inquiry to SKAT	1/19/2021
122	E-mail chain re SOIK's 1/22 inquiry to SKAT seeking copy of Settlement Agreement	1/22/2021
123	SOIK's 1/28 inquiry to SKAT and e-mail chain	1/28/2021
124	SKAT's response to SOIK's 1/28 inquiry and e-mail chain	2/3/2021
125	SOIK's 2/26 inquiry to SKAT and e-mail chain	2/26/2021
127	Email chain between M. Miller and SKAT's U.S. counsel regarding providing copy of Settlement Agreement to SOIK	4/23/2021
128	Email from SKAT's U.S. counsel re compliance with Section 8(f)	6/18/2021
129	2021 Affidavit of Confession of Judgment	6/9/2021
130	Danish court opinion re Bech Bruun	11/20/2023
131	E-mail chain re SOIK's 1/22 inquiry to SKAT for copy of the Settlement Agreement	1/22/2021
137	E-mail to SOIK re Section 8(f)	4/12/2023
141	SKAT's email to SOIK re confidentiality of Settlement Agreement	1/22/2021
141T	SKAT's email to SOIK re confidentiality of Settlement Agreement [Translated]	1/22/2021
200	Letter to SKAT's U.S. counsel providing MPSKAT documents	7/18/2021
201	Letter to SKAT's U.S. counsel providing True-Up Spreadsheets	6/30/2020
202	Letter from North Channel Bank regarding opening of custody account	10/27/2014
203	2015 custody account spreadsheet	2015
204	June 2015 custody account statement	6/30/2015
205	2016 custody account spreadsheet	7/8/1905
206	January 2017 custody account statement	1/30/2017
207	April 2017 custody account statement	4/30/2017
208	Letter from North Channel Bank regarding lack of activity	4/25/2016
209	Letter from North Channel Bank regarding lack of activity	12/15/2016
210	Danish court ruling regarding seizure of North Channel Bank custody accounts	2/16/2017
211	German court ruling regarding seizure of North Channel Bank custody accounts	5/30/2017
212	May 2015 custody account statement	5/31/2015
213	November 2013 custody account statement	11/13/2013
214	February 2015 custody account statement	2/3/2015
300	Expert Report prepared by L. Madsen	9/6/2024
301	Rebuttal Expert Report prepared by L. Madsen	10/15/2024

Exhibit #	Summary	Date
302	Source documents referred to in Expert Report and Rebuttal Expert Report prepared by L. Madsen	
303	Additional source document in support of Expert Report and Rebuttal Expert Report prepared by L. Madsen	
304	SKAT MAPLEPOINT documents cited in Expert Report and Rebuttal Expert Report prepared by L. Madsen	
305	STEIN LHOTE documents cited in Expert Report and Rebuttal Expert Report prepared by L. Madsen	
400	SKAT designated 30(b)(6) deposition testimony	
401	SKAT's designated responses to Stein/Lhote RFAs	
402	SKAT's designated responses to McGee RFAs	
403	SKAT's designated responses to Stein/Lhote ROGs	
404	SKAT's designated responses to McGee ROGs	